



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

February 4, 2022

VIA ECF

Hon. Ronnie Abrams
United States District Judge
United States District Court
40 Foley Square
New York, New York 10007

Re: *Jian Wen He v. Cardinale* No. 21 Civ. 11200 (RA)

Dear Judge Abrams:

This Office represents the government in this action in which the plaintiff seeks an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate an Application to Register Permanent Residence or to Adjust Status (Form I-485) and three Refugee / Asylee Relative Petitions (Form I-730). On behalf of the government, I write respectfully to request that the initial conference presently scheduled for February 25, 2022, be adjourned until on or after March 18, 2022.

The adjournment is respectfully requested because the plaintiff served this Office by mail on January 6, 2022, and thus the response to the complaint is not due until March 8, 2022. *See* Fed. R. Civ. P. 12(a)(2), 6(d). The government is still determining the status of the plaintiff’s application as well as the steps in the adjudicative process and the timing therefor. The parties thus respectfully submit that an adjournment until March 18, 2022 (*i.e.*, the Friday of the week following the current due date for the government’s response to the complaint) or thereafter would be in the interests of efficiency and conservation of judicial and party resources. This is the first request to adjourn the initial conference. The plaintiff consents to this request.

I thank the Court for its consideration of this letter.

Application granted. The telephonic status conference is hereby adjourned to March 25, 2022 at 2:30 p.m.

SO ORDERED.

Hon. Ronnie Abrams
2/7/2022

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: s/ Jacqueline Roman
JACQUELINE ROMAN
Special Assistant United States Attorney
Telephone: (347) 714-3363
E-mail: jacqueline.roman@usdoj.gov

cc: Counsel of record (via ECF)